

COUNTY OF SUFFOLK



STEVEN BELLONE
COUNTY EXECUTIVE

EDWARD WEBBER
POLICE COMMISSIONER

POLICE DEPARTMENT

March 31, 2014

Gail M. Lolis
Deputy County Attorney
H. Lee Dennison Building
100 Veterans Memorial Highway, 6th Floor
P.O. Box 6100
Hauppauge, NY 11788

Dear Ms. Lolis:

In accordance with paragraph V(f) of our Agreement with the United States Justice Department I forwarded to you on February 27, 2014, our plan for the dissemination and review of the Suffolk County Police Department Language Access Plan. By letter dated March 20, 2014 (attached) the Department of Justice has requested further clarification regarding certain portions of that plan.

I directed our Compliance Coordinator to provide the requested information and have attached his report.

Sincerely,

Edward Webber
Police Commissioner



ACCREDITED LAW ENFORCEMENT AGENCY

30 YAPHANK AVENUE, YAPHANK, NEW YORK 11980 – (631) 852-6000



POLICE DEPARTMENT COUNTY OF SUFFOLK, NEW YORK

INTERNAL CORRESPONDENCE

TO: Edward Webber
Commissioner of Police
FROM: Christopher A. Love, Sergeant 1086
Compliance Coordinator
Office of the Police Commissioner, Legal
DATE: 3/31/2014
COPY TO: As Required
SUBJECT: RESPONSE TO DOJ QUERY OF MARCH 20, 2014

The following information was gathered with the assistance of Detective Lieutenant Donohue and Sergeant Lynch of the Community Response Bureau and is intended to answer the questions posed by Mr. Goldberger and Ms. Coon in their letter of March 20, 2014 (attached).

The Community Response Bureau will ensure implementation of the following measures in order to achieve the widest possible relevant dissemination of the LAP. The Language Access Plan (LAP) will be provided in English and Spanish initially. Going forward, it will be translated into each of the five (5) additional languages most commonly spoken in the County; Mandarin Chinese, Polish, Italian, Portuguese and Haitian Creole. The print copies which will be made available at the Precincts will be in a marked bin in the public areas. The Department is currently in the process of having the LAP translated into Spanish, and will have hardcopies in place at the Precincts, and electronic copies on the internet by May 1, 2014.

The list of all active community groups is kept by the Community Response Bureau (CRB). Some of the groups thus far identified have been working with the Department for several years, such as Adelante. Others, such as Make the Road New York, have come to us more recently since the joint investigation was launched. As new groups contact the Department, they will be added to the list if appropriate. Additionally, as CLO's and Precinct COPE officers identify new groups through their community outreach duties, those officers will facilitate the addition of such groups to the CRB list. To our knowledge, no group seeking inclusion has thus far been denied. Going forward, all groups requesting inclusion, and any actions taken on such requests will be included in the semi-annual Compliance Reports required by the Agreement.

Monthly Precinct/Community meetings are presently held, and will be used as the initial outreach vehicle for the new CLOs and COPE officers, who will then expand into other groups within the community, such as civic, advocacy and neighborhood watch organizations. Meetings conducted by the CLOs and COPE officers will be regularly held outside the confines of the Precinct buildings in locations such as schools, community centers and churches. Finally, as part of their routine duties they will spend time in youth centers, resource centers, local businesses and community based agencies in order to foster an open dialogue and positive community relations.

SCPD will train its officers on the LAP in a three tiered fashion. Initially, the LAP, along with an explanatory Department Directive will be issued through official channels. The Directive will explain the LAP and also assign distribution responsibilities. Next, all members of the Department will be introduced to the Agreement and the LAP by means of a short DIIT film. This film will instruct them about the contents and goals of the Agreement and the LAP and will also foreshadow the full day of training that will follow. Finally, the officers will be trained on the LAP and all LEP measures put in place by the Agreement during that full day training session at the Police Academy.

Present plans are to conduct public service announcements (PSAs) in Spanish and English. PSAs in the 5 other languages as noted above will follow if sufficiently reliable outlets can be identified.

The CLOs will report daily to the Precinct Commander/Executive Officer, and to the Command Officer (CO) of CRB weekly. They will submit a monthly written report to the CO of CRB which will be copied to the Precinct Commander. CRB will consider community feedback and all suggested changes and additions. All legitimate proposals will be forwarded to the Police Commissioner for command staff consideration pursuant to established procedure. Measures that will be adopted will then be returned to CRB and CRB will facilitate all changes and keep all relevant parties and organizations updated via the CLOs and COPE. All proposals, adopted or not, will be included in the annual review.

The Latino Community Advisory Committee was developed by CRB which compiled a list of advocates from local Latino organizations. These advocates were then consulted, and in turn they recommended additional representatives to attend, such as Patrick Young from the Central American Refugee Center, Luis Valenzuela from the Long Island Immigrant Alliance, Amol Sinha, Director of the Suffolk County chapter of the New York Civil Liberties Union, Cheryl Keshner from the Empire Justice Center and Martha Maffei and Sepa Mujer organization. This committee can be expanded to include additional advocates upon request, through the quarterly meetings with high level officers, and via community meetings with the CLO and COPE officers.

Respectfully submitted,

A handwritten signature in black ink that reads "Love Sgt 1086/1000". The signature is fluid and cursive, with the last name "Love" being the most prominent part.

Christopher A. Love, Sergeant 1086/1000
Compliance Coordinator
Office of the Police Commissioner, Legal



U.S. Department of Justice
Civil Rights Division

JS:MJG:LC:SDR:BB:
DJ 207-52-4

*Special Litigation Section - PHB
950 Pennsylvania Ave, NW
Washington DC 20530*

March 20, 2014

Via Electronic Mail and First Class Mail

Ms. Gail M. Lolis
Deputy County Attorney
H. Lee Dennison Building
100 Veterans Memorial Highway
P.O. Box 6100
Hauppauge, NY 11788-0099

Re: Suffolk County Police Department proposed process plan for implementing LAP

Dear Ms. Lolis:

We write to respond to your letter detailing how the Suffolk County Police Department (SCPD) intends to implement its Language Access Policy (LAP). Thank you for providing us your plan in a timely manner. Below, we provide you with a few questions about SCPD's proposed plan for dissemination and review of the LAP. For your convenience, our questions track the order of the paragraphs in your letter.

In the first paragraph, you indicate that the Language Access Policy (LAP) will be made available in print. Can you please expand on which languages will be used? Also, please describe where exactly in the precincts/headquarters the LAP would be made available. Additionally, when do you expect this to be fully completed?

In the second paragraph, you indicate that the LAP will be delivered to community groups that either advocate for Limited English Proficient (LEP) individuals or are active with LEP communities. You identified some exemplar groups. Can you please explain how you will select the full list of organizations? How did you select the exemplar groups? Did they approach SCPD? Are there any groups who approached SCPD who were not included? How will your office identify the organizations to which you will send these materials?

In the fourth paragraph, you explain that Community Liaison Officers (CLOs) will conduct presentations in each precinct explaining the LAP and outlining the SCPD's policies. Can you tell us how many presentations will be held? Will presentations be available outside of the SCPD precinct building? Separately, what is SCPD's plan on training SCPD members on the LAP?

In the sixth paragraph, you explain that SCPD will use Spanish newspapers to incorporate the LAP into their public service announcements (PSAs). Does SCPD have any plans to conduct PSAs in English or any other languages?

With regard to the SCPD's efforts to ensure that feedback on the LAP's efficacy is received, you described a few different measures SCPD will be undertaking. We appreciate this information and provide the following questions:

At the top of page 3, you explain that precinct CLOs will report all feedback received at community meetings regarding the LAP on a monthly basis. To whom will the CLOs report this information? If the information will be provided to the Community Response Bureau (CRB), who specifically at CRB? In what format (e.g. written, verbal) will this information be provided? What process will the CRB follow in deciding what changes are warranted on the basis of community feedback, and will you inform community groups what decision was made on their suggestions? Additionally, will the information gathered by CLOs at community meetings also be included in the "annual review" mentioned with regard to the responses via social media? We commend you on your commitment to amending the Language Access Policy on a rolling basis.

In the third paragraph on page 3, you list a committee comprised of Latino community leaders. Can you please explain how you developed this list? Also, please describe if you anticipate a process if other organizations wish to join?

We look forward to continuing to collaborate with you on additional SCPD policy and practice improvements.

Sincerely,

/s/Laura Coon
Laura Coon
Special Counsel
Civil Rights Division
Special Litigation Section

/s/Michael Goldberger
Michael Goldberger
Chief of Civil Rights
Civil Division
United States Attorney's Office
Eastern District of New York

cc: Edward Webber
Suffolk County Police Department